

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: February 14, 1994

SUBJECT: Review of the Comments Prepared by Woodward-Clyde  
Consultants on the RI Risk Assessment for the Granite  
City Site, Granite City, Illinois

FROM: Pat Van Leeuwen, Toxicologist *PV*  
Technical Support Unit

TO: Brad Bradley  
Remedial Project Manager

I have reviewed the comments prepared by the Woodward-Clyde Consultants on their review of the Risk Assessment section of the RI report for the Granite City site (September, 1988). I would feel uncomfortable including these comments as an Appendix in the FS Addendum for the following reasons:

(1) The comments indicate that the 1988 Risk Assessment was prepared properly under relevant guidance for 1988. My recollection is that all three methods used in the 1988 Risk Assessment were found to be unacceptable by the EPA Region 5 risk assessor (Dave Dolan) at that time, and that the document was never approved. I'm not certain we want to say now that it was done correctly.

(2) The Woodward-Clyde review did not address the additional Appendix I prepared, in which I indicated that Region 5 never approved the document and that the methodology used was unacceptable in 1990, although the conclusions were valid. We also proposed the use of the OSWER Directive on Lead Soil Cleanup Levels for Superfund and evaluated the site using version 0.3 of the UBK Model for lead. The Woodward-Clyde review does not acknowledge this additional work.

(3) The response is not well written and contains some inaccuracies - e.g., "Because of the age-specific effects of lead, the USEPA has developed a computer model..." and "based on the epidemiological studies mentioned above, USEPA has chosen a blood lead level of 10 ug/dL...". Statements like this would be difficult to defend and could cause some problems down the line.



(4) I did like the summary table that they had prepared. Perhaps you could include this table along with some minimal comment. You need to check if Region 5 had included similiar comments as part of their review of the 1988 Risk Assessment (I suspect that we did). Was the Region 5 review ever incorporated into the final document?

If you you want to discuss this further, please call me at (312) 886-4904.